



**PHILLIPS & ASSOCIATES**

*Attorneys at Law*

BROADWAY, SUITE 620, NEW YORK, NEW YORK 10006

TEL: (212) 248-7431 FAX: (212) 901-2107

[WWW.NYCEMPLOYMENTATTORNEY.COM](http://WWW.NYCEMPLOYMENTATTORNEY.COM)

A PROFESSIONAL LIMITED LIABILITY COMPANY

January 28, 2020,

**VIA ECF**

The Honorable Stewart D. Aaron  
United States Magistrate Judge for the  
Southern District of New York  
500 Pearl Street  
New York, New York 10007

**Re: Jocelyn R. Taylor v Bowmo, Inc. and Matthew Kupferman**  
**Case No.: 18-cv-10379 (LTS) (SDA)**

Dear Judge Aaron:

This office represents Plaintiff, Jocelyn R. Taylor, in the above-referenced matter. Plaintiff writes to respectfully request the Court to stay the fact discovery deadline in this matter. Plaintiff has conferred with Defendants' counsel and they do not oppose the request to stay the fact discovery deadline.

Pursuant to the Court's Order, dated October 31, 2019, fact discovery deadline is scheduled to be completed by January 31, 2020. (See Docket No. 30). The reason for this request is to allow the parties additional time to continue settlement discussion and finalizing the terms and conditions of the settlement agreement. This is the second request for a stay/hold to this matter's fact discovery deadline. The previous request was denied by the Court.

We thank Your Honor for his time in this matter and consideration of this request.

Respectfully yours,

/s/

Irene Chan, Esq.  
Marjorie Mesidor, Esq.  
*Attorneys for Plaintiff*  
**Phillips & Associates, PLLC**  
45 Broadway, Suite 620  
New York, New York 10006  
[ichan@tpglaws.com](mailto:ichan@tpglaws.com)  
[mmesidor@tpglaws.com](mailto:mmesidor@tpglaws.com)

Request GRANTED IN PART and DENIED IN PART. The deadline for the completion of all discovery (fact and expert) is hereby extended to April 15, 2020. SO ORDERED.

Dated: January 29, 2020

To: All counsel of record (Via ECF)